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July 17, 2025

Via ECF

Honorable Nusrat J. Choudhury

United States District Judge

Eastern District of New York

100 Federal Plaza

Central Islip, NY 11722

Re: *Kelman v. Blumenthal, et al.*

Docket No. : 2:25-cv-02029

Our File No. : 169L-109810

Dear Judge Choudhury:

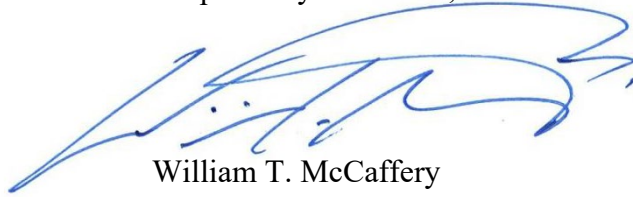
This firm represents defendants, Elliot J. Blumenthal and Law Offices of Elliot J. Blumenthal, PLLC ("Blumenthal Defendants"), in the above referenced action. The claims in this action sound in legal malpractice.

This letter is written to request a two-week extension of time under which the Blumenthal Defendants may serve their contemplated motion to dismiss from July 21, 2025 to August 4, 2025. The reason for the requested extension is twofold: 1) we are engaging in settlement discussions with plaintiff and are awaiting a response from our carrier; 2) I have been out of New York State this week on a personal matter.

Plaintiff's counsel has consented to my proposed extension and no previous requests for any extension have been made. Should your Honor entertain my request, it is respectfully requested that Plaintiff's time to submit an Amended Complaint and/or opposition to the Blumenthal Defendants' motion be extended from August 28, 2025 to September 1, 2025. Finally, the Blumenthal Defendants' time to serve a reply shall be extended from August 25, 2025 to September 8, 2025. By September 15, 2025, the Blumenthal Defendants must deliver to Chambers two courtesy copies of the fully briefed motion to dismiss, including exhibits.

Thank you for your consideration.

Respectfully submitted,



William T. McCaffery

cc: ***Via ECF***
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